

UNITED STATES OF AMERICA

v.

MOHAMMED KAMIN

D-012

**GOVERNMENT RESPONSE**

To Defense Motion to Dismiss For Failure to  
Provide Discovery

**21 October 2008**

1. **Timeliness**: This motion is filed within the timelines established by Military Commissions Trial Judiciary Rule of Court 3(6)(b).

2. **Relief Requested**: The Government respectfully requests that the Defense's motion to dismiss for failure to provide discovery be denied. The Government also requests that the Defense's request for production of witnesses be denied.

3. **Overview**: The Commission should deny the Defense motion to dismiss as the Government has complied and continues to comply with its discovery obligations. The Defense motion is premature and without merit. The Government provided discovery on multiple occasions and asserts that it has provided all available evidence it believes to be material to the preparation of the Defense case, intended for use by the Government at trial, or would otherwise be discoverable under Rule for Military Commission (RMC) 701(e), *Brady v. Maryland*, 373 U.S. 83 (1963), or *Giglio v. United States*, 405 U.S. 150 (1972). The Government is aware of its ongoing obligation to provide discovery in accordance with RMC 701(a)(5) and will continue to comply with diligence if discoverable information becomes available at a future time. The Defense's broad and non-specific allegations of systemic problems with the discovery process that occurred prior to the referral of charges in *United States v. Kamin* are irrelevant and share no nexus to the instant case.

4. **Burden and Persuasion**: As the moving party, the Defense bears the burden of establishing, by a preponderance of the evidence, that it is entitled to the requested relief. See RMC 905(c)(1), 905(c)(2)(A).

5. **Facts**:

a. On 4 April 2008, charges in *United States v. Kamin* were referred to trial by Military Commission. The Accused was arraigned on 21 May 2008.

b. On 9 June 2008, the Government provided initial discovery totaling 88 pages of which the Defense acknowledged receipt (see **Attachment A**).

c. On 12, 19, 21, and 24 June 2008, the Defense submitted various additional discovery requests to the Government.

d. In addition to verbal and electronic mail responses, the Government provided written responses to the Defense regarding these discovery requests on 28 July 2008 and 31 July 2008.

e. On 21 July 2008, the Military Judge ordered the release of the Accused's medical records. These medical records, totaling 106 pages, were turned over to the Defense.

f. On 29 July 2008, the Government provided further discovery totaling 484 pages of which the Defense acknowledged receipt (see **Attachment B**).

g. On 5 August 2008, the Government provided additional discovery totaling three pages of which the Defense acknowledged receipt (see **Attachment C**).

h. On 11 August 2008, the Defense submitted two additional memoranda elaborating and expanding upon initial discovery requests.

i. On 21 August 2008, the Deputy Secretary of Defense issued a memorandum laying out the procedure for initiating Prudential Search Requests (PSRs). PSRs are the primary tools used by the prosecution to probe Government agencies for information related to the prosecution of a case. On 3 September 2008 and 9 September 2008, the prosecution submitted additional PSRs to Government agencies in an effort to see if some of the information the Defense requested is available subject to MCRE 505 and RMC 701(f). Results of these PSRs are pending.

j. In addition, the Government is currently awaiting equity review of potential discovery material, which it will provide to the Defense immediately after this review is complete.

k. As of the date of this filing, the Government has provided 168 documents totaling 683 pages of discovery material obtained during the pre-referral investigation of the charges and diligent search of all known evidence relevant to the case. The material provided to the Defense contains all known evidence that it intends to use at trial, subject to the privilege set forth in MCRE 505 and RMC 701(f) (see **Attachment D**).

## **6. Discussion**

### *a. Dismissal with Prejudice is Not an Appropriate Remedy under RMC 701(l)(3)*

i. The Government has complied and continues to comply with its discovery obligations. Therefore, the Commission need not consider adverse action under RMC 701(l)(3)(D). Defense counsel's request for dismissal of the Charges with prejudice is not an appropriate remedy contemplated within the confines of RMC 701(l)(3)(D), even if adverse action is warranted.

ii. The Defense asserts that under the Commission's supervisory powers, dismissal is the appropriate remedy in this specific case. However, the Defense has failed to make any showing of "outrageous Government conduct" or "illegal conduct" to warrant such an exercise of power. In fact, the Defense clearly asserted on multiple occasions that Trial Counsel, as agents of the United States Government, have not committed any prosecutorial misconduct, wrongdoing, or purposeful delay. There exists no evidence or adequate showing by the Defense that such serious misconduct occurred in this case that would warrant the Commission consider such a measure.

iii. The Defense asserts that because of alleged systemic failures of the Government discovery process the Military Judge is “required” to dismiss the Charge in the interests of justice. However, such a remedy has not been contemplated for failure to provide discovery. The Defense concedes that no case on review in U.S Federal or state court has ever dismissed a charge for such allegations, but claims that the new and unique rules of the Commission present conditions whereupon the Commission should consider dismissal. However, RMC 701(l)(3) mirrors Rule for Courts Martial (RCM) 701(g)(3) nearly verbatim, to include their respective discussion notes following the rule. This rule was based on Federal Rule of Criminal Procedure (Fed. R. Crim. P.) 16(d)(2), which in turn incorporates Fed. R. Crim. P. 12.1(d) and 12.2(d); none of which contemplate dismissal as an appropriate remedy for a finding of a failure to comply with discovery. In fact, the analysis section of RCM 701(g)(3) does not suggest dismissal for even the most willful and blatant violations of applicable discovery rules. The Defense fails to draw any distinction between the existing RMC 701(l)(3) and the rules existing at military courts-martial or in U.S. Federal court to warrant a remedy not contemplated by other courts.

*b. The United States Has Complied and Continues to Comply with its Discovery Obligations*

i. The Government produced 168 documents totaling 683 pages to Defense as part of its discovery obligation. When turned over, the Government asserted that the Defense had everything the Government had or intended to use, indicating that any information relevant for the prosecution’s case on the merits was contained in that discovery, subject to the privilege set forth in RMC 505 and 701(f). Much of the information the Defense claims to be “outstanding” are from requests made after the Defense received all information the Government intends to use at trial.

ii. The assertion that the Government failed to comply with its discovery obligations is premature and without merit. The Defense failed to show that the Government has not complied with any order or deadline and the Defense has not filed a motion to compel any particular piece of evidence. The Defense’s claim is routed in supplemental memoranda requests that fail to articulate how the requested information is relevant or material to the preparation of their case. Rather, they are blanket requests for a broad base of information, many of which were overly general in nature and lacked sufficient explanation to deem the request actionable. The Government has provided two written responses and multiple verbal and electronic mail responses to Defense’s request for additional material. In part, the Government denied certain requests for information on its face because the Defense failed to make a showing of how it was relevant or material to the preparation of their case. Nonetheless, the Government is working diligently to review all materials it receives in response to recent PSRs and recognizes its ongoing obligation to provide discovery to Defense.

iii. Under RMC 701 *et seq.* there is an established procedure for addressing matters of the discovery phase prior to trial on the merits. The Defense has not utilized these established procedures. The instant motion lacks clarity and specificity as to the outstanding discovery material desired and requests a remedy not contemplated under the rule.

c. *The Appropriate Application of the Discovery Standard*

i. The Defense asserts a broader interpretation of the discovery standard than provided for by statute, under the RMC, or according to case law. The Defense failed to articulate with specificity the material it deems discoverable and a proffer of how it is material to the preparation of the Defense case. In relevant part, RMC 701(c) provides that

the Government shall permit the defense counsel to examine . . . [a]ny . . . documents . . . which are within the possession, custody, or control of the Government, the existence of which is known or by the exercise of due diligence may become known to trial counsel, and which are material to the preparation of the defense . . . .

As the discussion note to RMC 701(c) indicates, the starting point for defining what is “material to the preparation of the defense” is *United States v. Yunis*, 867 F.2d 617 (D.C. Cir. 1989). In *Yunis*, the D.C. Circuit set forth a three-step analysis (of which only the first two are applicable for the present motion) for determining when the Government must disclose information to the Defense. In order for such information to be discoverable, the Defense has the burden of demonstrating that the requested information is both *relevant* and *material* to its case. *See id.* at 621-22.<sup>1</sup> The third step is to balance the Accused’s need for access to the information in the preparation of his defense against the Government’s need to keep the information from disclosure by reason of its potential harm to the country’s national security interests. The Government need not address this third step since the Defense has not raised any specific objection to a piece of material not provided due to a Government assertion of the national security privilege under RMC 505.

ii. Defense failed in its first order of business by specifically stating which material it deems discoverable, making this motion premature. When the Defense does provide, with specificity, the material of which it requests production, the Government must turn to the first step in the *Yunis* inquiry and look at the relevance of the material requested. In *Yunis*, the D.C. Circuit applied Federal Rule of Evidence 401, which provides that evidence is relevant when it has “any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.” *Yunis*, 867 F.2d at 622 (quoting Fed. R. Evid. 401) (internal quotation marks omitted). There, the Court of Appeals noted that granting an Accused access to his statements generally requires only a minimal showing of relevance. *See id.* at 621-22. The court determined that the defendant in that case had failed to meet even this lower standard of relevance since “[n]othing in the classified documents in fact goes to the innocence of the defendant *vel non*, impeaches any

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<sup>1</sup> Under *Yunis*, where the requested information is classified and the Government asserts privilege under the Classified Information Protection Act (“CIPA”), the court may permit disclosure of the evidence only after balancing the defendant’s interest in disclosure against the Government’s need to keep the information secret. *See id.* at 625. This balancing test occurs only after the Defense has proven the relevance and materiality of the requested information. *See id.* Under the MCA and MMC, however, the Government’s authority to withhold discovery with respect to classified evidence is even broader than under CIPA. *See* 10 U.S.C. § 949d(f)(1); RMC 701(f). In any event, at present, the Government has not asserted the national security privilege with respect to the information sought by the Defense. Were the Government to assert such a privilege, numerous other obstacles would be raised to the Defense’s instant motion.

evidence of guilt, or makes more or less probable any fact at issue in establishing any defense to the charges.” *Id.* at 624.

iii. In the instant case, there can be no doubt that much of the information requested in the various Defense discovery requests fail to satisfy the above standard of relevance. As an initial matter, we note that the Defense does not benefit from the lower threshold cited in *Yunis*, since the statements of the Accused are not at issue. Nonetheless, the Defense maintains that it must merely show that the information is “at least helpful to the defense” for it to be discoverable. *See* Mot. to Dismiss at 8, n. 1. This is a misreading of the actual quotation from *Yunis*, which states that the defendant “is entitled *only* to information that is at least ‘helpful to the defense of [the] accused.’” *Yunis*, 867 F.2d at 623 (emphasis added; alteration in original) (quoting *Roviaro v. United States*, 353 U.S. 53, 60-61 (1957)). For information to be relevant it is necessary, but not sufficient, that the information be helpful to the defense. Rather, as *Yunis* makes clear, the “relevant” and “helpful to the defense” inquiries are distinct. *See id.* at 622.

iv. Although Defense fails to specify what information they think requires production, when Defense finally does identify what they are seeking the Commission may apply the second step in *Yunis*, determining the “materiality” of the evidence requested. The Defense falls short at reaching this second step by failing to show how the information sought is more than theoretically relevant to their case. The Defense asserts that the Commission should follow the common practice in the military justice system to provide an expansive interpretation of an Accused’s discovery rights, citing *United States v. Dancy*, 38 M.J. 1, 5 (C.M.A. 1993) et al. *See* Mot. to Dismiss at 8, n. 2. The Supreme Court in *United States v. Valenzuela-Bernal*, 458 U.S. 858 (1982), set a higher relevance standard than that which the Defense claims should apply here. In *Valenzuela-Bernal*, the Supreme Court rejected the analysis of the Court of Appeals that a constitutional violation had occurred where the Government deprived the defense of evidence that could have produced a “conceivable benefit” to the defense. *See id.* at 862. Instead, the Supreme Court held that *Roviaro*’s test of materiality is the proper standard. *See id.* at 870-71. The Court elaborated upon this standard by explaining that there is no reversible error with respect to conviction unless there is “a reasonable likelihood that the testimony could have affected the judgment of the trier of fact.” *Id.* at 874. Based on this, Defense counsel has failed to demonstrate that the information sought would have a reasonable likelihood of affecting the outcome in this case.

v. The Defense then turns to *Brady v. Maryland*, 373 U.S. 83 (1963), asserting the Government failed to comply with its obligation to provide exculpatory evidence known to the Government but unknown to the Defense. The Defense has made no showing of fact nor produced any substantive argument to support this claim.

d. *There is No Factual Showing of a Systemic Failure in the Discovery Process in United States v. Mohammed Kamin*

i. The Defense provided no evidence to show how the allegations of former prosecutors have any relevance or nexus to this case. As such, the Government respectfully requests the Commission give no weight to this portion of the Defense’s motion.

ii. The Government is unaware of any evidence that suggests either [REDACTED] [REDACTED] was detailed to investigate or pursue charges against the Accused. In addition, the issues referenced by these two individuals occurred four (4) years prior to the referral of this case and four (4) years prior to the issuance of the new DoD policy regarding Prudential Search Requests. As such, any suggestion that their allegations exist today are baseless and the Defense has provided no evidence to suggest otherwise.

iii. The Defense has failed to show how the statement by LTC Darrel Vandeveld, USAR bares any relevance to this case. As the Commission and Defense counsel are aware, LTC Vandeveld was never detailed as prosecutor to this case. There is no evidence to suggest he was ever involved in the preparation or investigation of the charges, either. In addition, the statement made by LTC Vandeveld is solely related to his involvement in *United States v. Jawad*. At no point in that statement, in his subsequent testimony under oath, or to any member of the media, has LTC Vandeveld made any allegation of systemic problems of discovery in *United States v. Kamin*. The Defense has failed to show relevance of his statements to the issues of discovery as they pertain to the instant case.

iv. The Defense does not allege any prosecutorial misconduct, wrongdoing, or purposeful delay by detailed Trial Counsel in regards to discovery in the instant case. Rather, the Defense argues that there are systemic failures with the system that have caused undue harm to the Accused. The Defense based their argument on two things: (1) email correspondence between two former prosecutors dated four years prior to the referral of this case; and (2) a declaration of another former prosecutor never assigned to this case. The Defense's allegations lack any contemporary evidence to suggest problems with the system and have no nexus to this case.

## **7. Defense Witness Request**

a. The Government opposes the Defense request for the following witnesses as the Defense has failed to make a showing that any of these witnesses have specific knowledge or information regarding the discovery process as it related specifically to *United States v. Kamin*. As such, their testimony is not relevant to any discussion regarding the status of specific discovery requests made by Defense counsel in this case:

- i. [REDACTED], Director of Department of Defense Executive Services Directorate.
- ii. [REDACTED], Principal Deputy General Counsel performing duties of General Counsel, Central Intelligence Agency (CIA).
- iii. [REDACTED], General Counsel, National Security Agency (NSA).

b. The Defense made overly broad and baseless assertions regarding the testimony of each of these witnesses, which if even interpreted in the light most favorable to the defense, makes their testimony irrelevant. The Defense provided no basis upon which to allege that any of these particular agencies failed to adequately search its records or make such records available for review by prosecutors for relevant and material information as it pertains specifically to *United States v. Kamin*. The testimony of the General Counsel of these agencies would not provide the Defense or this Commission with a basis to challenge the discoverability of any specific material.

**8. Conclusion:** The Commission should deny the Defense motion to dismiss because the Government has complied and continues to comply with its discovery obligations. In addition, dismissal of the Charge is an inappropriate remedy under Rule for Military Commission (“RMC”) 701(l)(3). The Government is aware of its ongoing obligation to provide discovery in accordance with RMC 701(a)(5) and continues to comply with diligence. Any allegations of systemic problems with the discovery process that occurred prior to the referral of charges in *United States v. Kamin* are not germane to these proceedings and share no nexus to the instant case. The Commission should deem it irrelevant to the issues at hand.

**9. Oral Argument:** In view of the authorities cited above, which directly, and conclusively, address the issues presented; the Prosecution believes that the motion to dismiss should be denied. Should the Military Judge order the parties to present oral argument, the Government is prepared to do so.

**10. Certificate of Conference:** The Defense conferred with the Prosecution regarding the requested relief and the Prosecution objected.

**11. Attachments:**

- A. Acknowledgement of Service, dtd 09 June 2008
- B. Acknowledgement of Service, dtd 29 June 2008
- C. Acknowledgement of Service, dtd 05 August 2008
- D. US v. Kamin Discovery Log

**12. Respectfully Submitted by:**

//s//  
Omar S. Ashmawy  
Maj, USAF  
Trial Counsel  
Office of Military Commissions  
Office of Chief Prosecutor

//s//  
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CPT, JA, USA  
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Office of Military Commissions  
Office of Chief Prosecutor

# **ATTACHMENT A**

## ACKNOWLEDGEMENT OF SERVICE

I hereby acknowledge receipt of the Discovery Release - 20080609, in the case of U.S. V. Kamin, containing 2 Compact Disc with following part:

1. Referral Binder (S//NF): 01045-000001 to 01045-000055
2. Mental Health Records Vol 1.1-1.4: 01045-000056 to 01045-000088

In this discovery release, I also acknowledge that the release contains protected information. I certify that I will handle any protected information in accordance with the existing Protective Orders.

9 Jun 08  
Date



Defense Representative

# **ATTACHMENT B**

## ACKNOWLEDGEMENT OF SERVICE

I hereby acknowledge receipt of the Discovery Release - 20080805, in the case of U.S. V. Kamin, containing 1 Compact Disc with following part:

Exhibit R-1 (Summary of Evidence) of CSRT ISN 1045: 01045-000681 to 01045-000682

CSRT ISN 1045 - Decision Report Cover Sheet: 01045-000683 to 01045-000683

In this discovery release, I also acknowledge that the release contains protected information. I certify that I will handle any protected information in accordance with the existing Protective Orders.

5 AUG 2008

Date



Defense Representative

R.E. FEDERICO  
LT JAGC USN

# **ATTACHMENT C**

## ACKNOWLEDGEMENT OF SERVICE

I hereby acknowledge receipt of the Discovery Release, in the case of U.S. V. Kamin, containing 2 Compact Discs (CDs) with following part:

Classified Discovery (S//NF): 01045-000196 to 01045-000578  
Unclassified Discovery: 01045-000579 to 01045-000680

In this discovery release, I also acknowledge that the release contains protected information. I certify that I will handle any protected information in accordance with the existing Protective Orders.

29 Jul 98

Date



Defense Representative

# **ATTACHMENT D**

# US V KAMIN-Discovery Releases

Bates - Begin	Bates - End	Full Name
01045-000001	01045-000055	Referral Binder
01045-000056	01045-000065	ISN 1045 MH- Vol 1.1
01045-000066	01045-000075	ISN 1045 MH- Vol 1.2
01045-000076	01045-000085	ISN 1045 MH- Vol 1.3
01045-000086	01045-000088	ISN 1045 MH- Vol 1.4
01045-000089	01045-000108	ISN 1045 Vol 1.Redacted
01045-000109	01045-000127	ISN 1045 Vol 2.Redacted
01045-000128	01045-000192	ISN 1045 Vol 3.Redacted
01045-000193	01045-000195	ISN 1045 Vol 4.Redacted
01045-000196	01045-000198	ASP- US9AF-01045DP
01045-000199	01045-000200	B5926034011204 - US9AF-01045DP
01045-000201	01045-000201	C7556044208903 - US9AF-01045DP
01045-000202	01045-000204	CITF Preliminary Assessment for Continued Detention, dated 20050610
01045-000205	01045-000361	DIMS - 1045
01045-000362	01045-000364	Factual Summary, dated 20051204
01045-000365	01045-000367	FM40 20030710 - US9AF-01045DP
01045-000368	01045-000368	FM40 20030813 - US9AF-01045DP
01045-000369	01045-000370	FM40 20051115 - US9AF-01048DP
01045-000371	01045-000373	IIR 6 034 0003 06 - US9AF-01045DP
01045-000374	01045-000376	IIR 6 034 0060 06 - US9AF-01045DP
01045-000377	01045-000380	IIR 6 034 0069 06 - US9AF-01045DP
01045-000381	01045-000382	IIR 6 034 0083 05 - US9AF-01045DP
01045-000383	01045-000386	IIR 6 034 0112 04 - US9AF-00818DP
01045-000387	01045-000389	IIR 6 034 0168 06 - US9AF-01045DP

US V KAMIN-Discovery Releases

Bates - Begin	Bates - End	Full Name
01045-000390	01045-000394	IIR 6 034 0298 05 - US9AF-01045DP
01045-000395	01045-000397	IIR 6 034 0301 05 - US9AF-01045DP
01045-000398	01045-000400	IIR 6 034 0375 05 - US9AF-01045DP
01045-000401	01045-000402	IIR 6 044 2061 03 - US9AF-01045DP
01045-000403	01045-000404	IIR 6 044 2088 03 - US9AF-01045DP
01045-000405	01045-000406	IIR 6 044 2089 03 - US9AF-01045DP
01045-000407	01045-000409	IIR 6 044 2090 03 - US9AF-01045DP
01045-000410	01045-000411	IIR 6 044 2091 03 - US9AF-01045DP
01045-000412	01045-000413	IIR 6 044 2092 03 - US9AF-01045DP
01045-000414	01045-000415	IIR 6 044 2161 03 - US9AF-01045DP
01045-000416	01045-000417	IIR 6 044 2228 03 - US9AF-01045DP
01045-000418	01045-000419	IIR 6 044 2387 03 - US9AF-01045DP
01045-000420	01045-000421	IIR 6 044 2533 03 - US9AF-01045DP
01045-000422	01045-000423	IIR 6 044 2534 03 - US9AF-01045DP
01045-000424	01045-000425	IIR 6 044 2568 03 - US9AF-01045DP.pdf_sealed
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01045-000434	01045-000458	IIR 6 105 0183 05 - US9AF-01045DP
01045-000459	01045-000461	IN T569-010-0708
01045-000462	01045-000465	IN T569-01-0527
01045-000466	01045-000468	IN T569-011-0714
01045-000469	01045-000471	IN T569-012-0725
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# US V KAMIN-Discovery Releases

Bates - Begin	Bates - End	Full Name
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01045-000485	01045-000488	IN T569-03-0529
01045-000489	01045-000493	IN T569-04-0530
01045-000494	01045-000497	IN T569-05-0611
01045-000498	01045-000500	IN T569-06-0612
01045-000501	01045-000504	IN T569-07-0623
01045-000505	01045-000507	IN T569-08-0630
01045-000508	01045-000511	IN T569-09-0702
01045-000512	01045-000515	IN T569-SCREENING-0526
01045-000516	01045-000517	Interrogation Report, 20040614
01045-000518	01045-000520	Interrogation Report, 20040722
01045-000521	01045-000522	JTF Daily Interrogation Report, from 201400ZAug03 to 211359ZAug03
01045-000523	01045-000527	JTF Recommendation to Retain
01045-000528	01045-000529	KB- Dragon Tower - US9AF-0145DP.pdf_sealed
01045-000530	01045-000530	Original File (DIA Request to CIA, dated 20040113.pdf)_Sealed
01045-000531	01045-000532	SECSTATE 20040923 - US9AF-01045DP
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01045-000540	01045-000542	SIR 20050505 (#11061) - US9AF-01045DP
01045-000543	01045-000543	SIR 20050610 (#11396) - US9AF-01045DP

US V KAMIN-Discovery Releases

Bates - Begin	Bates - End	Full Name
01045-000544	01045-000544	SIR 20050614 (#11428) - US9AF-01045DP
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01045-000546	01045-000546	SIR 20050630 (#11528) - US9AF-01045DP
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01045-000557	01045-000558	SIR 20051020 (#12665) - US9AF-01045DP
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01045-000561	01045-000561	SIR 20051122 (#13002) - US9AF-01045DP
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01045-000570	01045-000570	SIR 20060117 (#13527) - US9AF-01045DP
01045-000571	01045-000571	SIR 20060413 (#14504) - US9AF-01045DP
01045-000572	01045-000572	SIR 20060421 (#14579) - US9AF-01045DP

# US V KAMIN-Discovery Releases

	Bates - Begin	Bates - End	Full Name
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	01045-000574	01045-000575	SIR 20060712 (#15352) - US9AF-01045DP
	01045-000576	01045-000576	SIR 20060719 (#15446) - US9AF-01045DP
	01045-000577	01045-000577	SIR 20060726 (#15504) - US9AF-01045DP
	01045-000578	01045-000578	SIR 20060802 (#15582) - US9AF-01045DP
	01045-000579	01045-000581	CITF Request for Information from CIA, dated 20041120.pdf_sealed
	01045-000582	01045-000583	FM40 20050505 01015
	01045-000584	01045-000585	FM40 20051109 01590
	01045-000586	01045-000587	FM40 20051117 01048
	01045-000588	01045-000588	FM40 20051121 01045
	01045-000589	01045-000589	FM40 20051202 01048
	01045-000590	01045-000590	GUAN-2004-A00721
	01045-000591	01045-000591	GUAN-2004-T05176
	01045-000592	01045-000592	GUAN-2004-T06131
	01045-000593	01045-000593	GUAN-2005-
	01045-000594	01045-000594	GUAN-2005-A00439
	01045-000595	01045-000595	GUAN-2005-A00625
	01045-000596	01045-000596	GUAN-2005-A02522
	01045-000597	01045-000597	GUAN-2005-A02523
	01045-000598	01045-000598	GUAN-2005-A03062
	01045-000599	01045-000599	GUAN-2005-A03838
	01045-000600	01045-000600	GUAN-2005-B00523
	01045-000601	01045-000601	GUAN-2005-B02196
	01045-000602	01045-000602	GUAN-2005-B02197

US V KAMIN-Discovery Releases

Bates - Begin	Bates - End	Full Name
01045-000603	01045-000603	GUAN-2005-B02389
01045-000604	01045-000604	GUAN-2005-B02716
01045-000605	01045-000605	GUAN-2005-B02717
01045-000606	01045-000606	GUAN-2005-B02718
01045-000607	01045-000607	GUAN-2005-B02719
01045-000608	01045-000608	GUAN-2005-B04647
01045-000609	01045-000610	GUAN-2005-B04648
01045-000611	01045-000612	GUAN-2005-B04649
01045-000613	01045-000613	GUAN-2005-B04650
01045-000614	01045-000614	GUAN-2005-B04651
01045-000615	01045-000615	GUAN-2005-B04652
01045-000616	01045-000616	GUAN-2005-B04653
01045-000617	01045-000617	GUAN-2005-B04654
01045-000618	01045-000619	GUAN-2005-B04655
01045-000620	01045-000620	GUAN-2005-T00091
01045-000621	01045-000621	GUAN-2005-T00309-130537
01045-000622	01045-000622	GUAN-2005-T01199
01045-000623	01045-000623	GUAN-2005-T01309
01045-000624	01045-000624	GUAN-2005-T01439
01045-000625	01045-000625	GUAN-2006-A00451
01045-000626	01045-000626	GUAN-2006-A01092
01045-000627	01045-000627	GUAN-2006-A01528
01045-000628	01045-000628	GUAN-2006-A01529
01045-000629	01045-000629	GUAN-2006-A01530

US V KAMIN-Discovery Releases

	Bates - Begin	Bates - End	Full Name
	01045-000630	01045-000630	GUAN-2006-A01531
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	01045-000632	01045-000632	GUAN-2006-B00522
	01045-000633	01045-000634	GUAN-2006-B00524
	01045-000635	01045-000635	GUAN-2006-B00525
	01045-000636	01045-000637	GUAN-2006-B00526
	01045-000638	01045-000638	GUAN-2006-B00527
	01045-000639	01045-000640	GUAN-2006-B00528
	01045-000641	01045-000642	GUAN-2006-B00529
	01045-000643	01045-000644	GUAN-2006-B00530
	01045-000645	01045-000646	GUAN-2006-B00531
	01045-000647	01045-000648	GUAN-2006-B00532
	01045-000649	01045-000650	GUAN-2006-B00533
	01045-000651	01045-000652	GUAN-2006-B02246
	01045-000653	01045-000654	GUAN-2006-B02247
	01045-000655	01045-000655	GUAN-2006-B02248
	01045-000656	01045-000656	GUAN-2006-B02249
	01045-000657	01045-000657	GUAN-2006-B02250
	01045-000658	01045-000658	GUAN-2006-B02251
	01045-000659	01045-000659	GUAN-2006-B02252
	01045-000660	01045-000660	GUAN-2006-B02254
	01045-000661	01045-000661	GUAN-2006-B02255
	01045-000662	01045-000663	GUAN-2006-B02256
	01045-000664	01045-000665	GUAN-2006-B02257

# US V KAMIN-Discovery Releases

	Bates - Begin	Bates - End	Full Name
	01045-000666	01045-000666	GUAN-2006-B02466
	01045-000667	01045-000667	GUAN-2006-T00291
	01045-000668	01045-000668	GUAN-2006-T00292
	01045-000669	01045-000670	GUAN-2006-T01118
	01045-000671	01045-000676	SECSTATE 20060606 01045
	01045-000677	01045-000680	Unclassified Summary of Basis for Tribunal Decision
	01045-000681	01045-000682	Exhibit R-1 (Summary of Evidence) of CSRT ISN 1045
	01045-000683	01045-000683	CSRT ISN 1045 - Decision Report Cover Sheet